

Anne P. Mulligan
Name
BEANS CAFE 1101 E. 3RD AVE
Mailing address
ANCHORAGE, AK 99501
City, State, Zip
907-764-5945
Telephone

RECEIVED

APR 19 2019

CLERK, U.S. DISTRICT COURT
ANCHORAGE, A.K.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Anne Patricia Mulligan
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Case No. _____
(To be supplied by Court)

Municipality of Anchorage
APD

COMPLAINT UNDER
THE CIVIL RIGHTS ACT
42 U.S.C. § 1983

(Enter full names of defendant(s) in this action.
Do NOT use *et al.*)

(NON-PRISONERS)

Defendant(s).

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you assert jurisdiction under any different or additional authorities, please list them below:

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Anne Patricia Mulligan
(print your name)

who presently resides at BEANS CAFE 1101 E. 3RD AVE. ANCHORAGE, AK 99501
(mailing address)

were violated by the actions of the individual(s) named below.

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, White male police officer is a citizen of
(name)
Alaska, and is employed as a APD Police Officer
(state) (defendant's government position/title)

 This defendant personally participated in causing my injury, and I want money damages.

OR

 x The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone do something).

Defendant No. 2, White male police officer is a citizen of
(name)
Alaska, and is employed as a APD Police Officer
(state) (defendant's government position/title)

 This defendant personally participated in causing my injury, and I want money damages.

OR

 x The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone do something).

Defendant No. 3, White male police officer is a citizen of
(name)
Alaska, and is employed as a APD Police Officer
(state) (defendant's government position/title)

 This defendant personally participated in causing my injury, and I want money damages.

OR

 x The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone do something).

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about 4/19/2017, my civil right to

(Date)

Freedom from cruel and unusual punishment
(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by WHITE MALE APD OFFICER

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

On 4/19/2017 I WAS brought into Regional Ambulance via Ambulance because I was having a lot of pain from the injuries that I obtained on 4/17/2017 from Officer Joshua Roberts - Officer Dan Fletcher that were never treated for when requested. After attempting to be seen for the 3rd time @ Regional ER, a white female nurse opened the door said I was fine that I wasn't going to be seen again and that I was being escorted out of the ER and trespassed for 1 yr. 3 white male security guards escorted me out contacted APD and 3 white male officers showed up. The officer that had PATTED ME down without my consent and he didn't read me my rights had been drinking, one officer told me that I needed to adjust my attitude + the other officer did nothing but watch + kept quiet. The officer that had been drinking got behind the wheel, the officer that told me that I needed to adjust my attitude got in the passenger side and I was dropped off @ Being Cold Weather Shelter. I was taken to Providence Hospital via Ambulance to have my upper body rechecked because I was short of breath and there were marks under my breasts that weren't there before. I filed a formal complaint w/ the ombudsman + internal affairs

Claim 2: On or about 4/19/2017, my civil right to

(Date)

Freedom from cruel & unusual punishment

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by White Male AD Officer

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

On 4/19/2017 I was brought into Regional Ambulance via Ambulance because I was having a lot of pain from the injuries that I obtained on 4/17/2017 from Officer Joshua Roberts & Officer Dan Fletcher that were never treated for when requested. After attempting to be seen for the 3rd time @ Regional ER, a white female nurse opened the door said I was fine that I wasn't going to be seen again and that I was being escorted out of the ER and trespassed for 1 yr. 3 white male security guards escorted me out contacted APD and 3 white male officers showed up. The officer that had patted me down without my consent and he didn't read me my rights had been drinking. One officer told me that I needed to adjust my attitude & the other officer did nothing but watch & kept quiet. The officer that had been drinking got behind the wheel, the officer that told me that I needed to adjust my attitude got in the passenger side and I was dropped off @ Beans Cold Weather Shelter. I was taken to Providence Hospital via Ambulance to have my upper body rechecked because I was short of breath and there were marks under my breasts that weren't there before. I filed a formal complaint w/ the ombudsman & internal affairs.

Claim 3: On or about 4/19/2017, my civil right to
(Date)
Freedom from cruel & unusual treatment
(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by WHITE MALE APD OFFICER
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant by name did to violate the right alleged in Claim 3.)

On 4/19/2017 I was brought into Regional Ambulance via Ambulance because I was having a lot of pain from the injuries that I obtained on 4/11/2017 from Officer Joshua Roberts & Officer Dan Fletcher that were never treated for when requested. After attempting to be seen for the 3rd time @ Regional ER, a white female nurse opened the door said I was fine that I wasn't going to be seen again and that I was being escorted out of the ER and trespassed for 1 yr. 3 white male security guards escorted me out contacted APD and 3 white male officers showed up. The officer that had patrolled me down without my consent and he didn't read me my rights had been drinking. One officer told me that I needed to adjust my attitude & the other officer did nothing but watch & kept quiet. The officer that had been drinking got behind the wheel, the officer that told me that I needed to adjust my attitude got in the passenger side and I was dropped off @ Beans Cold Weather Shelter. I was taken to Providence Hospital via Ambulance to have my upper body rechecked because I was short of breath and there were marks under my breasts that weren't there before. I filed a formal complaint w/ the ombudsman & internal affairs.

D. Previous Lawsuits

1. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action, or otherwise relating to your imprisonment? ____ Yes ____ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): Anne P. Mulligan

Defendant(s): Municipality of Anchorage / AP

Name and location of court: Superior Ct of Anchorage

Docket number: 3AM-19-05294 Name of judge: Jenni L. Henderson

Approximate date case was filed: 2/21/19 Date of final decision: _____

Disposition: ____ Dismissed ____ Appealed X Still pending

Issues Raised: hate crime, attempted murder

b. Lawsuit 2:

Plaintiff(s): Anne P. Mulligan

Defendant(s): Municipality of Anchorage

Name and location of court: Superior Court of Anchorage

Docket number: 3AM-19-05294 Name of judge: Jenni L. Henderson

Approximate date case was filed: _____ Date of final decision: _____

Disposition: ____ Dismissed ____ Appealed X Still pending

Issues Raised: Hate crime, attempted murder

F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 50 million dollars

2. Punitive damages in the amount of \$ 50 million dollars
3. An order requiring defendant(s) to go to jail + pay restitution
4. A declaration that All officers be remanded to jail
5. Other: Make restitution to the Plaintiff, immediate family
which includes grandchildren, uncles, brother, cousin
Plaintiff demands a trial by jury. X Yes No

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage, AK on 4/18/2019
(Location) (Date)

Anna P. Mulligan
(Plaintiff's Original Signature)

Anna P. Mulligan (Pro Se) 4-18-2019
Original Signature of Attorney (if any) (Date)

BEAMS CAFE
1101 E. 3RD AVE A1A 99501
907-764-5545
Attorney's Address and Telephone Number